

1 Andras F. Babero, Esquire
9101 West Sahara Avenue
Suite 105-340
2 Las Vegas, Nevada 89117
Telephone: (702) 277-9943
3 E-mail: andrasbabero@hotmail.com
Attorney for Defendants,
4 **Simon S. Abraham and**
KDA Holdings LLC

5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**
8

9 EZRA ILANI and CATHY ILANI, individuals

10 Plaintiffs

11 v.

12 SIMON S. ABRAHAM, an individual; KDA
13 HOLDINGS LLC, a domestic limited liability company; KING SOLOMONS TREASURES, LLC, a
14 domestic limited liability company; 777 HOLDINGS
15 INTERNATIONAL LTD, LLC, a domestic limited
16 liability company; AMASIAN GEM CORPORATION
17 OF NEVADA, a domestic corporation; LE SIMONE
18 JEWELRY LTD., a domestic corporation; KING
19 DAVID'S RIVER OF GOLD LLC, a domestic limited
20 liability company; JEWELRY JUDGE OF LAS
21 VEGAS LLC, a domestic limited liability company;
22 LAS VEGAS JEWELRY BROKER, LLC, a domestic
23 limited liability company; JOEL LACKEY, an
24 individual; Doe Defendants I through X, inclusive; and
25 Roe Corporations A through Z, inclusive.

26 Defendants.
27
28

1 SIMON S. ABRAHAM, individually; and KDA
2 HOLDINGS LLC, a Nevada limited liability company,

3
4 Defendants and Counterclaimants

5 v.

6 EZRA ILANI and CATHY ILANI, individually,

7 Plaintiffs and Counterdefendants

8
9 SIMON S. ABRAHAM, individually; and KDA
10 HOLDINGS LLC, a Nevada limited liability company,

11 Third-Party Plaintiff

12 v.

13
14 ADRIÁN MARCEL CAZARES, individually; and
15 CAZARES RESORTS LLC, a Nevada limited liability
16 company,

17 Third-Party Defendant.

18 **PROPOSED STIPULATION TO CONTINUE HEARING**

19 IT IS HEREBY STIPULATED by and between the parties, Plaintiffs, EZRA ILANI and
20 CATHY ILANI (hereinafter collectively referred to as the "Plaintiffs") and Defendants, KDA
21 Holdings, LLC and Simon S. Abraham (hereinafter collectively referred to as the "Defendants"),
22 by and through their respective attorneys of record as follows:

- 23
24 1. The purpose for this Stipulation is to continue the hearing currently set for November 27,
25 2018, at 10.00 A.M., due to Defendants' counsel having a conflict with another hearing
26 set for the same day and time.

1 2. The Plaintiffs' and Defendants' respective counsel conferred on November 14, 2018, via
2 e-mail, and determined that they would be available to attend a continued hearing at any
3 time set by the Court from November 28, 2018 through December 7, 2018.

4
5 3. The Parties also agree that, should any of the above-referenced proposed dates be
6 inconvenient or unacceptable for any reason, the Court has the discretion to set other
7 dates which are more convenient or acceptable.

8
9 Respectfully submitted,

10 Dated this 16th day of November 2018.

11 /s/Andras F. Babero, Esquire
12 Andras F. Babero, Esquire
13 Nevada Bar No.: 1658
14 The Law Office of Andras F. Babero
15 9101 West Sahara Avenue
16 Suite 105-340
17 Las Vegas, Nevada 89117
18 **Attorney for Defendants,**
19 **Simon S. Abraham and**
20 **KDA Holdings LLC**

21 Dated this 16th day of November 2018.

22 /s/Matthew T. Dushoff, Esquire
23 Kolesar & Latham
24 Nevada Bar No.: 4975
25 400 South Rampart Boulevard
26 Suite 400
27 Las Vegas, Nevada 89145
28 **Attorney for Plaintiffs**
Ezra Ilani and Cathy Ilani

1
2 **PROPOSED ORDER**

3 The Court, having reviewed the Stipulation of the Parties and finding good cause, hereby
4 issues an Order to continue the hearing on Plaintiffs' Motion for Order to Show Cause, and
5 Defendants' Motion for Protective Order until the 4th day of December, 2018, at the hour of
6 10:45 A.M.

7 It is so Ordered.

8 Dated this 19th day of November 2018.

9 
10 Magistrate Judge Peggy A. Leen